

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

JUSTIN BLAKE,

Plaintiff,

v.

Case No. 22 CV 970

DAVID BETH, et. al.,

Defendants.

**DEFENDANTS JESSICA BERGMANN, VISITING NURSE COMMUNITY CARE, INC.,
AND KENOSHA VISITING NURSE ASSOCIATION'S ANSWER AND AFFIRMATIVE
DEFENSES TO PLAINTIFF'S THIRD AMENDED COMPLAINT**

NOW COMES the Defendants Jessica Bergmann, Visiting Nurse Community Care, Inc., and Kenosha Visiting Nurse Association, by and through their attorneys, Borgelt, Powell, Peterson & Frauen, S.C., and responds to Plaintiff's Third Amended Complaint as follows:

1. Answering paragraph 1, deny.
2. Answering paragraph 2, deny.
3. Answering paragraph 3, deny.
4. Answering paragraph 4, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.
5. Answering paragraph 5, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.
6. Answering paragraph 6, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

7. Answering paragraph 7, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

8. Answering paragraph 8, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

9. Answering paragraph 9, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

10. Answering paragraph 10, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

11. Answering paragraph 11, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

12. Answering paragraph 12, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

13. Answering paragraph 13, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

14. Answering paragraph 14, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

15. Answering paragraph 15, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

16. Answering paragraph 16, admit that Bergmann was a medical professional employed by Visiting Nurse Community Care, Inc. working at the Kenosha Secure Detention Facility at the time of the allegations in the complaint. Deny that Bergmann was employed by Kenosha Visiting Nurse Association at the time of the allegations in the complaint. As to the

balance of the paragraph, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

17. Answering paragraph 17, admit that VNCC had a contract with the Kenosha County Sheriff's Department at the time of the allegations in the complaint. As to the balance of the paragraph, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

18. Answering paragraph 18, deny.

19. Answering paragraph 19, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

20. Answering paragraph 20, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

21. Answering paragraph 21, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

22. Answering paragraph 22, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

23. Answering paragraph 23, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

24. Answering paragraph 24, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

25. Answering paragraph 25, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

26. Answering paragraph 26, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

27. Answering paragraph 27, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

28. Answering paragraph 28, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

29. Answering paragraph 29, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

30. Answering paragraph 30, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

31. Answering paragraph 31, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

32. Answering paragraph 32, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

33. Answering paragraph 33, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

34. Answering paragraph 34, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

35. Answering paragraph 35, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

36. Answering paragraph 36, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

37. Answering paragraph 37, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

38. Answering paragraph 38, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

39. Answering paragraph 39, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

40. Answering paragraph 40, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

41. Answering paragraph 41, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

42. Answering paragraph 42, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

43. Answering paragraph 43, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

44. Answering paragraph 44, deny.

45. Answering paragraph 45, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

46. Answering paragraph 46, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

47. Answering paragraph 47, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

48. Answering paragraph 48, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

49. Answering paragraph 49, deny any allegations that relate to Bergmann. As to the balance of the paragraph, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

50. Answering paragraph 50, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

51. Answering paragraph 51, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

52. Answering paragraph 52, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

53. Answering paragraph 53, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

54. Answering paragraph 54, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

55. Answering paragraph 55, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

56. Answering paragraph 56, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

57. Answering paragraph 57, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

58. Answering paragraph 58, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

59. Answering paragraph 59, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

60. Answering paragraph 60, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

61. Answering paragraph 61, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

62. Answering paragraph 62, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

63. Answering paragraph 63, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

64. Answering paragraph 64, deny.

65. Answering paragraph 65, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

66. Answering paragraph 66, deny.

67. Answering paragraph mislabeled 127, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

68. Answering paragraph mislabeled 128, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

69. Answering paragraph 67, reallege and incorporate answers to the foregoing paragraphs.

70. Answering paragraph 68, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

71. Answering paragraph 69, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

72. Answering paragraph 70, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

73. Answering paragraph 71, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

74. Answering paragraph 72, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

75. Answering paragraph 73, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

76. Answering paragraph 74, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

77. Answering paragraph 75, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

78. Answering paragraph 76, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

79. Answering paragraph 77, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

80. Answering paragraph 78, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

81. Answering paragraph 79, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

82. Answering paragraph 80, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

83. Answering paragraph 81, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

84. Answering paragraph 82, reallege and incorporate answers to the foregoing paragraphs.

85. Answering paragraph 83, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

86. Answering paragraph 84, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

87. Answering paragraph 85, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

88. Answering paragraph 86, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

89. Answering paragraph 87, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

90. Answering paragraph 88, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

91. Answering paragraph 89, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

92. Answering paragraph 90, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

93. Answering paragraph 91, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

94. Answering paragraph 92, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

95. Answering paragraph 93, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

96. Answering paragraph 94, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

97. Answering paragraph 95, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

98. Answering paragraph 96, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

99. Answering paragraph 97, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

100. Answering paragraph 98, reallege and incorporate answers to the foregoing paragraphs.

101. Answering paragraph 99, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

102. Answering paragraph 100, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

103. Answering paragraph 101, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

104. Answering paragraph 102, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

105. Answering paragraph 103, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

106. Answering paragraph 104, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

107. Answering paragraph 105, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

108. Answering paragraph 106, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

109. Answering paragraph 107, reallege and incorporate answers to the foregoing paragraphs.

110. Answering paragraph 108, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

111. Answering paragraph 109, deny.

112. Answering paragraph 110, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

113. Answering paragraph 111, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

114. Answering paragraph 112, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

115. Answering paragraph 113, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

116. Answering paragraph 114, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

117. Answering paragraph 115, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

118. Answering paragraph 116, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

119. Answering paragraph 117, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

120. Answering paragraph 118, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

121. Answering paragraph 119, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

122. Answering paragraph 120, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

123. Answering paragraph 121, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

124. Answering paragraph 122, deny.

125. Answering paragraph 123, reallege and incorporate answers to the foregoing paragraphs.

126. Answering paragraph 124, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

127. Answering paragraph 125, deny.

128. Answering paragraph 126, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

129. Answering paragraph 127, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

130. Answering paragraph 128, deny.

131. Answering paragraph 129, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

132. Answering paragraph 130, deny.

133. Answering paragraph 131, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

134. Answering paragraph 132, deny.

135. Answering paragraph 133, deny.

136. Answering paragraph 134, reallege and incorporate answers to the foregoing paragraphs.

137. Answering paragraph 135, deny.

138. Answering paragraph 136, deny.

139. Answering paragraph 137, deny.

140. Answering paragraph 138, deny.

141. Answering paragraph 139, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

142. Answering paragraph 140, deny.

143. Answering paragraph 141, reallege and incorporate answers to the foregoing paragraphs.

144. Answering paragraph 142, deny.

145. Answering paragraph 143, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

146. Answering paragraph 144, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

147. Answering paragraph 145, deny.

148. Answering paragraph 146, deny.

149. Answering paragraph 147, deny.

150. Answering paragraph 148, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

151. Answering paragraph 149, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

152. Answering paragraph 150, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

153. Answering paragraph 151, deny.

154. Answering paragraph 152, deny.

155. Answering paragraph 153, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

156. Answering paragraph 154, deny.

157. Answering paragraph 155, reallege and incorporate answers to the foregoing paragraphs.

158. Answering paragraph 156, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

159. Answering paragraph 157, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

160. Answering paragraph 158, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

161. Answering paragraph 159, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

162. Answering paragraph 160, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

163. Answering paragraph 161, reallege and incorporate answers to the foregoing paragraphs.

164. Answering paragraph 162, deny.

165. Answering paragraph 163, deny.

166. Answering paragraph 164, deny.

167. Answering paragraph 165, deny.

168. Answering paragraph 166, deny.

169. Answering paragraph 167, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

170. Answering paragraph 168, deny.

171. Answering paragraph 169, reallege and incorporate answers to the foregoing paragraphs.

172. Answering paragraph 170, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

173. Answering paragraph 171, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

174. Answering paragraph 172, reallege and incorporate answers to the foregoing paragraphs.

175. Answering paragraph 173, admit that VNCC hired Bergmann and that Bermann was an employee of VNCC at the time of the allegations in the complaint. Deny that KVNA hired Bermann and deny that Bergmann was an employee of KVNA.

176. Answering paragraph 174, deny that Kenosha County hired KVNA. Affirmatively allege that VNCC had a contract with the Kenosha County Sheriff's Department at the time of the allegations in the complaint. As to the balance of the paragraph, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

177. Answering paragraph 175, deny.

178. Answering paragraph 176, deny.

179. Answering paragraph 177, deny.

180. Answering paragraph 178, deny.

181. Answering paragraph 179, deny.

182. Answering paragraph 180, deny.

183. Answering paragraph 181, reallege and incorporate answers to the foregoing paragraphs.

184. Answering paragraph 182, deny.

185. Answering paragraph 183, deny that Bergmann was an employee of KVNA. Admit that Bergmann was an employee of VNCC at the time of the allegations in the complaint.

186. Answering paragraph 184, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

187. Answering paragraph 185, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

188. Answering paragraph 186, deny.

189. Answering paragraph 187, deny.

190. Answering paragraph 188, deny.

191. Answering paragraph 189, deny.

192. Answering paragraph 190, reallege and incorporate answers to the foregoing paragraphs.

193. Answering paragraph 191, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

194. Answering paragraph 192, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

195. Answering paragraph 193, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

196. Answering paragraph 194, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

197. Answering paragraph 195, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

198. Answering paragraph 196, deny.

199. Answering paragraph 197, deny.

200. Answering paragraph 198, deny.

201. Answering paragraph 199, deny.
202. Answering paragraph 200, reallege and incorporate answers to the foregoing paragraphs.
203. Answering paragraph 201, deny.
204. Answering paragraph 202, deny.
205. Answering paragraph 203, deny.
206. Answering paragraph 204, deny.
207. Answering paragraph 205, deny.
208. Answering paragraph 206, reallege and incorporate answers to the foregoing paragraphs.
209. Answering paragraph 207, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.
210. Answering paragraph 208, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.
211. Answering paragraph 209, reallege and incorporate answers to the foregoing paragraphs.
212. Answering paragraph 210, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.
213. Answering paragraph 211, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.
214. Answering paragraph 212, deny.
215. Answering paragraph 213, deny.

216. Answering paragraph 214, without knowledge or information sufficient to form a belief as to the truth of the allegations and accordingly deny the same.

217. Answering paragraph 215, deny.

218. Answering paragraph 216, deny.

219. Answering paragraph 217, deny.

220. Answering paragraph 218, deny.

221. Answering paragraph 219, deny.

222. Answering paragraph 220, deny.

AFFIRMATIVE DEFENSES

1. Plaintiff failed to state claims upon which relief may be granted.

2. Plaintiff may have failed to join all necessary parties.

3. The injuries and damages sustained by Plaintiff, if any, were caused in whole or in part by the acts or omissions of Plaintiff or persons other than this answering Defendant.

4. Plaintiff's claims are precluded by the eleventh amendment to the United States Constitution.

5. Plaintiff's claims are barred by failure to exhaust remedies and/or otherwise failure to comply with the statutory prerequisites to bringing the action and/or are otherwise not ripe.

6. Plaintiff may have failed to mitigate his damages.

7. Plaintiff's claims may be barred by claim and issue preclusion.

8. Plaintiff has no standing to raise some or all of his claims.

9. Plaintiff may be estopped from pursuing his claims or may have waived his right to pursue the claims by reason of his own actions, omissions and course of conduct.

10. Plaintiff may have failed to satisfy the notice requirements in Wis. Stat. § 893.80(1)(a) and (b).

11. This answering defendant enjoys immunity, as well as limitations on actions and damages as is set forth, but not limited to, by Wis. Stat. § 893.80, by federal regulation, statute, code, and by common law.

12. Plaintiff's claims are barred in whole or in part by the doctrine of payment or release and barred due to accord, satisfaction, arbitration and award, and settlement.

13. Plaintiff's claims are barred in whole or in part by virtue of Plaintiff's own unclean hands.

14. Plaintiff's claims are barred by absolute, qualified, good-faith, or sovereign immunity.

15. Plaintiff's claims are moot because applicable regulations would preclude any decision of the court in Plaintiff's favor from having any practical effect.

16. These answering Defendants allege all affirmative defenses required to be pled under federal and state law, for purposes of avoiding waiver of any such defenses that may later apply and reserved the right to assert any further affirmative defenses that may become available as a result of future discovery in this lawsuit.

WHEREFORE, Defendants demand judgment:

1. Dismissing the third amended complaint on the merits and with prejudice;
2. Awarding statutory costs; and
3. Granting such further relief as may be appropriate.

Dated: September 7, 2023.

BORGELT, POWELL, PETERSON & FRAUEN, S.C.
Attorneys for Defendants Jessica Bergmann, Visiting Nurse
Community Care Inc., and Kenosha Visiting Nurse
Association

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